

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
Lynchburg Division**

WALTER SCOTT LAMB)	
)	Case No. 6:21-cv-00055
Plaintiff,)	
v.)	Hon. Norman K. Moon
)	
LIBERTY UNIVERSITY)	
)	
Defendant.)	
)	

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PLAINTIFF'S INITIAL RULE 26(a)(1)(A) DISCLOSURES

NOW COMES Plaintiff Walter Scott Lamb and for his first disclosure pursuant to Fed. R. Civ. P. 26(a)(1)(A) states as follows. Plaintiff specifically reserves the right to amend, correct, supplement and/or revise its disclosures at any time should it appear that omissions or errors have been made or if it receives additional or more accurate information in the future. Each disclosure is

made without waiving any privilege (including but not limited to attorney-client and attorney work-product) that may apply and without waiving any objections as to competency, relevancy, materiality, propriety and/or admissibility that may apply to any specific question, subject or use of information or evidence.

Witnesses: Rule 26(a)(1)(A)(i)

Walter Scott Lamb
c/o Rhoades McKee PC
55 Campau Avenue, NW, Suite 300
Grand Rapids, MI 49503
(616) 235-3500

Plaintiff, Walter Scott Lamb, will have knowledge of the facts and circumstances supporting Plaintiff's claims in this matter.

Jerry Prevo
c/o McGuireWoods LLP
Gateway Plaza, 800 East Canal Street
Richmond, VA 23219
(804) 775-1000

Mr. Prevo is the President of Liberty University and will have knowledge of the facts and circumstances of Plaintiff's termination from employment.

David M. Corry
c/o McGuireWoods LLP
Gateway Plaza, 800 East Canal Street
Richmond, VA 23219
(804) 775-1000

Mr. Corry is the General Counsel of Liberty University and will have knowledge of the facts and circumstances of Plaintiff's termination from employment.

John Gauger
c/o McGuireWoods LLP
Gateway Plaza, 800 East Canal Street
Richmond, VA 23219
(804) 775-1000

John Gauger is the Chief Information Officer and Vice President of Analytics of Liberty University and will have knowledge and information about the University's information and technology policies and procedures.

Robert Ritz
c/o McGuireWoods LLP
Gateway Plaza, 800 East Canal Street
Richmond, VA 23219
(804) 775-1000

Mr. Ritz is the Chief Financial Officer at Liberty University and will have knowledge and information about Plaintiff's termination from employment.

Cindy Gaebe
c/o McGuireWoods LLP
Gateway Plaza, 800 East Canal Street
Richmond, VA 23219
(804) 775-1000

Ms. Gaebe is the Senior Vice President of Finance and Chief Investment Officer and will have knowledge and information about Plaintiff's termination from employment.

Dr. Scott Hicks
c/o McGuireWoods LLP
Gateway Plaza, 800 East Canal Street
Richmond, VA 23219
(804) 775-1000

Dr. Hicks is the Provost and Chief Academic Officer at Liberty University and will have knowledge and information about Plaintiff's employment at Liberty University.

Laura Wallace
c/o McGuireWoods LLP
Gateway Plaza, 800 East Canal Street
Richmond, VA 23219
(804) 775-1000

Ms. Wallace is the Executive Vice President for Human Resources at Liberty University and will have knowledge of Liberty University's employment policies and the facts and circumstances of Plaintiff's termination from employment.

Steven Foster
c/o McGuireWoods LLP
Gateway Plaza, 800 East Canal Street
Richmond, VA 23219
(804) 775-1000

Mr. Foster is a Deputy in the Human Resources Department at Liberty University as well as Deputy Title IX Coordinator and will have knowledge of Liberty University's employment policies and the facts and circumstances of Plaintiff's employment.

Nathan Hopkins
c/o McGuireWoods LLP
Gateway Plaza, 800 East Canal Street
Richmond, VA 23219
(804) 775-1000

Mr. Hopkins is the Executive Director and Title IX Coordinator in the Liberty University Office of Equity and Inclusion and may have knowledge or information about Plaintiff's claims.

Ryan Helfenbein
c/o McGuireWoods LLP
Gateway Plaza, 800 East Canal Street
Richmond, VA 23219
(804) 775-1000

Mr. Helfenbein is the Executive Director of Liberty University's Standing for Freedom Center and may have knowledge and information about Plaintiff's claims.

Theresa McNabb
c/o McGuireWoods LLP
Gateway Plaza, 800 East Canal Street
Richmond, VA 23219
(804) 775-1000

Ms. McNabb is an executive assistant to Liberty University's executive leadership and may have knowledge and information about Plaintiff's employment at Liberty University.

Aaron Coffey
c/o McGuireWoods LLP
Gateway Plaza, 800 East Canal Street
Richmond, VA 23219
(804) 775-1000

Mr. Coffey works in the IT Services Department at Liberty University and may have knowledge or information about Plaintiff's assigned laptop computer.

Dr. Scott Hicks
c/o McGuireWoods LLP
Gateway Plaza, 800 East Canal Street
Richmond, VA 23219
(804) 775-1000

Dr. Hicks is the Provost and Chief Academic Officer at Liberty University and will have knowledge or information about Plaintiff's claims and termination from employment at Liberty University.

Jerry Falwell, Jr.
2100 Old Cifax Rd.
Goode, VA 24556

Mr. Falwell is the former President of Liberty University and hired Plaintiff. He may have knowledge and information about Plaintiff's claims in this matter.

Chris Carroll

Mr. Carroll is the former Vice President of Development at Liberty University and will have knowledge and information relevant to Plaintiff's claims.

Emily Heady

Ms. Heady is the former Vice Provost for Undergraduate Education at Liberty University and will have knowledge and information relevant to Plaintiff's claims.

Robert Mullen

Mr. Mullen is the former Title IX Coordinator at Liberty University and will have knowledge and information relevant to Plaintiff's claims.

All persons named in Defendant's initial disclosures or otherwise identified as witnesses.

Any witnesses necessary for rebuttal.

This list does not constitute Plaintiff's final witness list, which shall be disclosed as required by this Court's Case Management Order. Plaintiff reserves the right to add witnesses as they become known during the course of discovery.

Documents: Rule 26(a)(1)(A)(ii)

Plaintiff intends to rely on the following documents, data compilations and tangible things that are either in his possession or that will be created or requested from Defendant to support his claims:

- Documents from Plaintiff's personnel file with Liberty University;
- W-2s issued by Defendant;

- Documents summarizing Plaintiff's damages;
- Defendant's internal email, external email, and correspondence relating to his participation in the independent investigation by Baker Tilly, media inquiries relating to Title IX investigations and Clery Act noncompliance, Plaintiff's involvement with general messaging surrounding Title IX investigations, Clery Act noncompliance, sexual assault and harassment on campus, weaponization of "The Liberty Way," among other related issues;
- Any and all documents relating to Plaintiff and his termination.

This does not represent the complete list of documentary evidence on which Plaintiff expects to rely. Plaintiff expressly reserves the right to use any additional material obtained in discovery for any allowable purpose under the rules of civil procedure.

Damages: Rule 26(a)(1)(A)(iii)

Plaintiff damages for his retaliatory discharge claim include lost wages, bonuses, incentive payments, reliance damages, lost fringe benefits including, but not limited to health care, retirement, college tuition credits, and other benefits, liquidated damages, interest, costs, and attorneys' fees. To calculate his economic damages, Plaintiff will take his average weekly wage paid by Liberty University and multiply that amount by the number of weeks between his termination and trial to determine his "back pay" owed by Liberty University. Any interim income earned by Plaintiff that he would have been prevented from earning if he remained employed at Liberty University will be subtracted from his back pay. Plaintiff will also request the court award front pay for the period during which Plaintiff would have remained employed at Liberty University if he had not been unlawfully terminated.

Insurance: Rule 26(a)(1)(A)(iv)

Plaintiff has not insurance relevant to this procedure.

Plaintiff reserves the right to supplement this disclosure as additional information becomes known through discovery or otherwise.

Date: December 3, 2021

RHOADES McKEE PC
Attorneys for Defendant

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Ian A. Northon (Admitted pro hac vice)
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**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF VIRGINIA
Lynchburg Division**

WALTER SCOTT LAMB,)	
Plaintiff/Counterclaim Defendant,)	Case No. 6:21-cv-00055
v.)	Hon. Norman K. Moon
)	
LIBERTY UNIVERSITY, INC.,)	
a Virginia corporation,)	
Defendant/Counterclaim Plaintiff.)	

LAMB’S SUPPLEMENTAL INITIAL DISCLOSURES

Comes now Walter Scott Lamb, by counsel, and serves this supplement to his initial disclosures.

Supplements for witnesses previously disclosed under Rule 26(a)(1)(A)(i):

Walter Scott Lamb

Mr. Lamb will have knowledge of most of the facts and circumstances supporting his defenses in this matter, including: Defamation--the statements made for the defamation claims, the intended meaning of the statements, the truth of the statements, the lack of defamatory intent as to the statement and the alleged implied statement, the underlying facts, and Liberty’s reputation. Breach of Fiduciary Duties, Conspiracy, Conversion, Detinue, Trade Secrets, Breach of Contract—his conduct, the extent of his authorization.

Jerry Falwell, Jr.

Mr. Falwell is the former President of Liberty University. He was Lamb’s immediate supervisor between 2018 and 2020 and has personal knowledge of Liberty University’s and Mr. Lamb’s practices, such as his creation of audio recordings and his use of apps like Evernote, communications with Lamb, and his expectations for Lamb in his position with Liberty University.

Ryan Helfenbein

Mr Helfenbein will have knowledge of Lamb’s professional practices within his department, and the operations of the department.

Additional witnesses:

Jonathan Falwell

Jonathan Falwell is Chancellor of Liberty University. Mr. Falwell has knowledge of his communications directing one or more third parties who were alleged victims of sexual assault to make reports to the Baker-Tilly/Gentry Locke investigators, and communications with Lamb about this, and his internal and external communications about those communications.

Brad Butler
1145 Grand Oaks Dr
Forest, VA 24551
(434) 660-7310

Mr. Butler is a former administrator for Liberty University and is expected to have information pertinent to the alleged damages.

Johnnie Moore

Mr. Moore is expected to have information about Lamb's terminations and Liberty's alleged damages.

Karen Swallow Prior
karenswallowprior@gmail.com

Ms. Prior is a former employee of Liberty University and has knowledge pertaining to Liberty's alleged reputational damages

Mark Serrano
serrano@proactivecommunications.com

Mr. Serrano has knowledge pertaining to Liberty's alleged reputational damages.

Matt Hiltzik
mhiltzik@hstrategies.com

Mr. Hiltzik has knowledge pertaining to Liberty's alleged reputational damages.

Aram Roston
aramroston@gmail.com

Mr. Roston has knowledge pertaining to Liberty's alleged reputational damages.

Lamb may rely on the following additional documents under Rule 26(a)(1)(A)(ii):

1. *Does v. Liberty University, Inc.*, Case 2:21-cv-03964-JMA-ARL (E.N.Y. Dist. Court) complaint (ECF Doc. 2, with attachment 2-3), filed 07/20/21 [SL1781-1895]
2. “*Someone’s Gotta Tell the Freakin’ Truth*”: *Jerry Falwell’s Aides Break Their Silence*, by Brandon Ambrosino, Politico (Sept. 9, 2019) [SL1264-1286]
3. “*They thank me*”: *Jerry Falwell Jr. says Liberty community still embraces him*, by Maggie Severns, Politico (April 2, 2021) [SL1287-1297]
4. “*The Liberty Way*”: *How Liberty University Discourages and Dismisses Student’s Reports of Sexual Assaults*, by Hanna Dreyfus, ProPublica (Oct. 24, 2021) [SL1261-1263]
5. *Does v. Liberty University, Inc., et al.*, Case 6:22-cv-21-NKM-RSB (W.Va. Dist. Court) complaint (ECF Doc. 1-2), filed 02/27/22 [SL1781-1829]
6. *12 Women File Lawsuit vs Liberty U for Unsafe Environment, “Enabling On-Campus Rapes”*, by Sarah Einselen, The Roys Report (July 20, 2021) [SL1320-1343]
7. *Hunter v. U.S. Dept. Edu.*, Case 6:21-cv-474-AA (Ore. Dist. Court) first amended complaint (ECF Doc. 35), filed 06/07/21 [SL1693-1780]
8. *Liberty University, Inc. v. Falwell*, Case No. CL21-354-00 (Lynchburg Cir. Ct) complaint, filed April 15, 2021 [SL1543-1615]
9. *Liberty University, Inc. v. Falwell*, Case No. CL21-354-00 (Lynchburg Cir. Ct) first amended complaint, filed September 30, 2021 [SL1616-1692]
10. *In 50th Anniversary meeting, Trustees strengthen governance to protect institutional mission, honor founder*, by Liberty University (Press Release) (Nov. 5, 2021) [SL1261-1263]

11. *In Its Latest Public Filings, Liberty U. Blasts the President Who Turned It Into a Billion-Dollar Behemoth*, by Dan Bauman, The Chronicle (June 30, 2022) [SL1354-1359]
12. Articles of Restatement of Liberty University, Inc., dated September 26, 2017 [SL1494-1497]
13. Amended and Restated Articles of Incorporation of Liberty University, Inc., dated November 3, 2016 [SL1498-1502]
14. *Investigation Into Liberty University Business Operations Underway*, by Emma Whitford, Inside Higher Ed (Oct. 22, 2020) [SL1360]
15. *Investigation Into Liberty University Now Open*, by Christina Darnell, Ministry Watch (Oct. 22, 2020) [SL1361-1365]
16. Twitter Post of “Save71” of Oct. 27, 2021 at 7:34, with comments [SL1366-1372]
17. *Rape Victim Says Liberty University Deceived & Betrayed Her*, by Julie Roys, The Roys Report (June 3, 2021) [SL1373-1395]
18. Liberty University Inc. Amended and Restated Bylaw, through April 5, 2019, dated May 31, 2019 [SL1481-1493]
19. FAQ page from Baker-Tilly Investigation portal [SL1479-1480]
20. *Former Liberty University VP: Investigation firm did not interview sexual assault accusers*, by Cynthia Beasley, WSET.com (Oct. 27, 2021) [SL1396-1403]
21. Apple Podcasts Preview for Gangster Capitalism, season 3 [SL1475-1477]
22. *Hunter v. U.S. Dept. Edu.*, Case 6:21-cv-474-AA (Ore. Dist. Court) complaint (ECF Doc. 35), filed 03/29/21 [SL1896-1962]

23. *Liberty University Board pledges full commitment to spiritual mission and launches independent investigation*, by Liberty University (Press release) (Aug. 31, 2020) [SL1255-1256]
24. *Liberty reveals forensic investigation firm and launch of website for reporting misconduct*, by Liberty University (Press release) (Oct. 20, 2020) [SL1257-1260]
25. Liberty University Sexual Harassment and Interpersonal Violence Policy (Aug. 17, 2017) [SL1503-1542]
26. LU.integrityline.org FAQ page [SL1478]
27. Twitter Post of “Paul Southwick”, Mar. 31, 2021 at 10:46 a.m. [SL1404-1405]
28. Twitter Post of “Save71” of Oct. 21, 2021 at 2:53 p.m., with comments [SL1474]
29. *How Jerry Falwell Jr. mixed his personal finances with his university's*, Aram Roston, Joshua Schneyer, Reuters.com (Sept. 4, 2020) [SL1963-1981]
30. Exclusive: Trump fixer Cohen says he helped Falwell handle racy photos, Reuters, Aram Roston (May 7, 2019) [SL1344-1353]
31. *Business partner of Falwells says affair with evangelical power couple spanned seven years*, by Aram Roston [SL1406-1411]
32. *Rape Victims & Allies Tell Backstory of lawsuit vs. Liberty U*, The Roys Report [SL1412-1473]
33. Gangster Capitalism Season 3, Episode 7 [SL1982]
34. Gangster Capitalism Season 3, Episode 8 [SL1983]
35. Gangster Capitalism Season 3, Bonus Episode 1 [SL1984]
36. Gangster Capitalism Season 3, Bonus Episode 2 [SL1984]

37. “Liberty University's Handling of Sexual Assaults under Investigation by Department of Education.” Hannah Dreyfus. *ProPublica*, 29 Apr. 2022, <https://www.propublica.org/article/liberty-university-investigation-sexual-assault-department-education>. [SL2008-2010]
38. “Education Dept. Investigates Liberty University amid Assault Claims.” Susan Svrluga. *The Washington Post*, 3 May 2022, <https://www.washingtonpost.com/education/2022/05/03/liberty-university-investigation-clery-act/>. [SL1986-1987]
39. “Lawsuits against Liberty Prompt Dept. of Ed to Investigate.” Josh Moody *Lawsuits against Liberty Prompt Dept. of Ed to Investigate*, 9 May 2022, <https://www.insidehighered.com/news/2022/05/09/lawsuits-against-liberty-prompt-dept-ed-investigate>. [SL1998-2002]
40. “U.S. Dept. of Education Investigating Liberty University's Handling of Sexual Assault Claims.” Eddie Callahan *WDBJ*, 29 Apr. 2022, <https://www.wdbj7.com/2022/04/29/us-dept-education-investigating-liberty-universitys-handling-sexual-assault-claims/>.
41. Save71. “Update: Department of Education Officials Will Return to @Libertyu next Week to Investigate Violations of the Clery Act (a Federal Law Requiring That Universities Accurately Report Campus Crime Data and Support Victims of Violence.)70+ Lu Employees Are Going to Be Interviewed. <https://t.co/c1b6apl8jj>.” *Twitter*, 21 Apr. 2022, <https://twitter.com/save71LU/status/1511533651389034499>. [SL2017-2018]

42. “Hulu 'God Forbid' Becomes Its Most-Watched Doc Film Ever,” Jennifer Maas. *Variety*, 28 Nov. 2022, <https://variety.com/2022/film/news/god-forbid-ratings-hulu-sarah-lawrence-sex-cult-doc-1235440727/>. [SL1988-1997]
43. “New Hulu Documentary Recaps Rise of Moral Majority and Downfall of Jerry Falwell Jr..” Emily Miller. *Religion News Service*, 3 Nov. 2022, <https://religionnews.com/2022/11/03/new-hulu-documentary-recaps-rise-of-moral-majority-and-downfall-of-jerry-falwell-jr/>. [SL2011-2016]
44. “U.S. Department of Education Investigating Liberty University over Title IX, Sexual Misconduct c...” *YouTube*, YouTube, 29 Apr. 2022, <https://youtu.be/npI44BiM02I>. [SL2019-2023]
45. “Jane Doe 15 Speaks out about Liberty University Lawsuit.” *YouTube*, 23 July 2022, <https://youtu.be/Jsw4zodSSdU>.
46. “Liberty University Could Face Serious Fines in Federal Investigation.” Cynthia Beasley. *WSET*, 11 May 2022, <https://wset.com/news/abc13-investigates/liberty-university-could-face-serious-fines-federal-investigation-lawsuit-department-of-education-clery-act-compliance-program-s-daniel-carter-title-ix-sexual-assault-jane-doe-may-11-2022-lynchburg-virginia>. [SL2003-2007]
47. “What Does a Federal Title IX Investigation Mean for Liberty University?” *YouTube*, YouTube, 2 May 2022, <https://youtu.be/urKQl7PO1Do>.
48. Lori K @ LoriK2point0 October 1, 2021 Twitter Post [SL2024]
49. Lori K @ LoriK2point0 October 1, 2021 Twitter Post [SL2025-2031]
50. Any documents disclosed by Liberty in its discovery responses to Rule 26 disclosures.

Respectfully submitted,
WALTER SCOTT LAMB

THOMAS H. ROBERTS & ASSOCIATES, P.C.

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of April, 2022, I presented the foregoing document(s) to the Clerk of the Court for filing and uploading to the CM/ECF system, which will provide electronic notice and copies of such filing(s) to counsel of record.

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ATTORNEYS FOR PLAINTIFF

**IN THE UNITED STATES DISTRICT COURT FOR THE
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WALTER SCOTT LAMB,)	
Plaintiff/Counterclaim Defendant,)	Case No. 6:21-cv-00055
v.)	Hon. Norman K. Moon
)	
LIBERTY UNIVERSITY, INC.,)	
a Virginia corporation,)	
Defendant/Counterclaim Plaintiff.)	

LAMB’S SUPPLEMENTAL INITIAL DISCLOSURES

Comes now Walter Scott Lamb, by counsel, and serves this supplement to his initial disclosures.

Lamb may rely on the following documents under Rule 26(a)(1)(A)(iii):

1. Relevant Magazine, “A Liberty University Professor Has Been Arrested on Suspicion of Sexual Battery and Kidnapping a Student” (Dec. 2, 2021) [SL-153 to 155]
2. NPR, “After Falwell's Departure, Liberty Students Worry About Their School And Their Faith” (Aug. 18, 2020) [SL-156 to 161]
3. Wall Street Journal, “After Jerry Falwell Jr., a Reckoning for Liberty University” (Sept. 6, 2020) [SL-162 to 169]
4. Politico, “An Evangelical Battle of the Generations: To Embrace Trump or Not?” (June 1, 2021) [SL-170 to 183]
5. WSET, “Another alleged sexual assault involving Liberty University student reported” (May 6, 2022) [SL-184 to 185]
6. Reuters, “Business partner of Falwells [says affair with evangelical power couple spanned seven years” (Aug. 24, 2020) [SL-186 to 190]

7. FoxNews, “911 call from Falwell house reveals ex-Liberty president was drinking, fell down, lost 'a lot of blood' after resigning” (Sept. 18, 2020) [SL-191 to 194]
8. WSET, “Watch: Cellphone footage of Liberty University arrest at Candler Station parking lot” (July 30, 2021) [SL-195 to 202]
9. WSLS, “Dept. of Education investigating Liberty University over Title IX, sexual misconduct cases” (Apr. 29, 2022) [SL-203 to 205]
10. Washington Post, “Education Department investigates Liberty University after sexual assault complaints” (May 3, 2022) [SL-206 to 207]
11. Gangster Capitalism Podcast, “Jerry Falwell Jr. and Liberty University - Ep 1: Quid Pro Quo” (May 26, 2021) [SL-208 to 222]
12. Gangster Capitalism Podcast, “Jerry Falwell Jr. and Liberty University - Ep 2: Hostel Arrangement” (May 26, 2021) [SL-223 to 238]
13. Gangster Capitalism Podcast, “Jerry Falwell Jr. and Liberty University - Ep 3: Protecting the Brand” (June 2, 2021) [SL-239 to 270]
14. Gangster Capitalism Podcast, “Jerry Falwell Jr. and Liberty University - Ep 4: Bust or Boom” (June 9, 2021) [SL-271 to 290]
15. Gangster Capitalism Podcast, “Jerry Falwell Jr. and Liberty University - Ep 5: Controlling the Narrative” (June 16, 2021) [SL-291 to 317]
16. Gangster Capitalism Podcast, “Jerry Falwell Jr. and Liberty University - Ep 6: The Family Business” (June 23, 2021) [SL-318 to 340]
17. New York Times, “Even before Falwell resigned, he was not invited back to the Republican convention” (Aug. 24, 2020) [SL-341 to 342]

18. NewsAdvance.com, “Ex-Liberty student sentenced in sexual battery case” (Oct. 1, 2020) [SL-343 to 345]
19. Politico, “Falwell apologizes for unzipped pants photo: ‘I’m gonna try to be a good boy’ (Aug. 5, 2020) [SL-346 to 348]
20. Politico, “Falwell invites students to ‘real Liberty graduation’ at his home” (Apr. 30, 2021) [SL-349 to 351]
21. AP News, “Falwell says he’s resigned from Liberty University” (Aug. 25, 2020) [SL-352 to 355]
22. Politico, “Falwell says he’s resigned from Liberty University” (Aug. 20, 2020) [SL-356 to 359]
23. Politico, “Falwell sought to cut financial ties to pool attendant before Trump’s campaign” (Aug. 25, 2020) [SL-360 to 366]
24. New York Times, “Falwell Taking Leave From Liberty University Amid Photo Uproar” (Aug. 7, 2020) [SL-367 to 370]
25. TheHill.com, “Falwell under scrutiny for using NASCAR driver’s yacht on vacation” (Aug. 20, 2020) [SL-371 to 375]
26. RVA Magazine, “Falwell’s Fall: The Optics of Jerry Falwell Jr.’s ‘Leave of Absence’” (Aug. 20, 2020) [SL-376 to 381]
27. Politico, “Falwell’s use of yacht comes under scrutiny” (Aug. 20, 2020) [SL-382 to 387]
28. ChristianPost.com, “50 pastors who graduated from Liberty University demand Falwell be ‘permanently removed’” (Aug. 21, 2020) [SL-388 to 390]

29. WSLS, “Former employee sues Liberty University for discrimination based on sex, religion, race” (July 19, 2021) [SL-391 to 394]

30. WRXR TV, “Former LGBTQ students describe culture of fear and punishments at Liberty University” (Apr. 1, 2021) [SL-395 to 408]

31. WSET, “Former Liberty police chief denies handling sexual assault; records match victim's claim” (July 26, 2021) [SL-409 to 418]

32. WDBJ7, “Former Liberty University employee files discrimination lawsuit” (Jul. 6, 2021) [SL-419 to 420]

33. CNN, “Former Liberty University professor: Happy truth is out” [SL-421 to 429]

34. Christian Today, “Former Liberty University student levels new allegations at Falwell's wife” (Aug. 29, 2020) [SL-430 to 431]

35. WSLS, “Former Liberty University student says Becki Falwell initiated sexual encounter, Politico reports” (Aug. 28, 2020) [SL-432 to 435]

36. Washington Times, “Former NFL player claiming discrimination sues Liberty University after firing” (July 7, 2021) [SL-436 to 437]

37. Axios, “Former student claims Liberty University mishandled sexual assault allegations” (Apr. 28, 2022) [SL-438 to 440]

38. NPR, “‘Free At Last,’ Says Jerry Falwell Jr. After Resigning As Head Of Liberty University” (Aug. 25, 2020) [SL-441 to 444]

39. FoxNews, “EXCLUSIVE: Giancarlo Granda claims Falwell Jr. has been ‘relentlessly harassing’ him since sex scandal broke” (Sept. 9, 2020) [SL-445 to 450]

40. Daily Beast, “Giancarlo Granda Says Jerry Falwell Jr. Watched Him Have Sex With Wife” (Aug. 24, 2020) [SL-451 to 457]

41. Daily Mail, “Hannah Graham's abductor Jesse Matthews 'expelled from University over rape claims’” (Sept. 25, 2014) [SL-458 to 478]
42. Washington Post, “Hugh Freeze, Jerry Falwell Jr. and Liberty University's football gambit” (Aug. 29, 2019) [SL-479 to 485]
43. Sojourners, “‘In God We Lust’ Is a Gossipy Take on the Falwell Saga. We Need More” (Aug. 3, 2021) [SL-486 to 489]
44. News Advance, “‘It ought to be better.’ Outcry over sex assaults culminates in Liberty University campus rally” (Nov. 4, 2021) [SL-490 to 525]
45. WSET, “‘It was just a power grab.’ Jerry Falwell Jr. says Liberty University seized his power” (Apr. 13, 2022) [SL-526 to 528]
46. Inside Edition, “Jane Does Speak to Inside Edition Accusing Liberty University of Mishandling Sexual Assault Claims” (Nov. 12, 2021) [SL-529 to 533]
47. Washington Post, “Jerry and Becki Falwell, pool attendant Giancarlo Granda and the affair that brought them down” (Sept. 18, 2020) [SL-534 to 541]
48. Washington Post, “Jerry Falwell Jr. agreed to resign from Liberty University, and then reversed course, school says” (Aug. 24, 2020) [SL-542 to 545]
49. Associated Press, “Jerry Falwell Jr. is asking a court to dismiss Liberty University's lawsuit against him, calling it an 'excuse to shame him' (June 5, 2021) [SL-546 to 547]
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Respectfully submitted,
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CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of June, 2022, I presented the foregoing document(s) to the Clerk of the Court for filing and uploading to the CM/ECF system, which will provide electronic notice and copies of such filing(s) to counsel of record.

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